

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

BLITZSAFE TEXAS, LLC,	§	
Plaintiff,	§	Case No. 2:19-cv-00378-JRG
	§	(LEAD CASE)
v.	§	JURY TRIAL DEMANDED
FIAT CHRYSLER AUTOMOBILES N.V.,	§	
FCA US LLC, MASERATI NORTH	§	
AMERICA, INC.,	§	
Defendants.	§	

JOINT MOTION TO DISMISS

Pursuant to the Federal Rules of Civil Procedure, Plaintiff Blitzsafe Texas LLC (“Blitzsafe”) and Defendants FCA US LLC and Maserati North America, Inc. (collectively, “FCA”), represented by their attorneys, hereby stipulate and agree to as follows:

The Complaint filed by Blitzsafe against FCA in the above-captioned case, including all claims and causes of action asserted by Plaintiff Blitzsafe against FCA, are dismissed with prejudice and without costs.

The foregoing dismissal of Blitzsafe’s claims against FCA is without prejudice to Blitzsafe’s right to file claims against any unlicensed suppliers who supply infotainment systems to FCA.

Each of the parties to this Joint Motion is to bear its own costs and fees, including attorney’s fees.

So agreed and stipulated.

A proposed order is attached as Exhibit A.

Respectfully submitted,

Dated: April 29, 2021

FABRICANT LLP

/s/ Alfred R. Fabricant

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Counsel for Defendants FCA US LLC and Maserati North America, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 29, 2021, a true and correct copy of the above and foregoing document has been served on counsel of record via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alfred R. Fabricant
Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), on April 29, 2021, Alfred Fabricant, Peter Lambrianakos, Samuel Baxter, Frank Cimino, Jonathan Falkler and J Thad Heartfield conferred via email and are in agreement to the relief requested herein.

/s/ Alfred R. Fabricant
Alfred R. Fabricant